

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

AMBER M. MEADE,	*	
	*	
Plaintiff,	*	
	*	
v.	*	CIVIL ACTION NO.
	*	1:16-cv-00991-AT
GENERAL MOTORS, LLC	*	
	*	
Defendant.	*	

CONSENT PROTECTIVE ORDER

The necessity for confidentiality of all tax, medical, and documents of a private nature of the Plaintiff, and personnel and business records of the Defendant (hereinafter referred to collectively as "documents") has been acknowledged by the parties to this action. Accordingly, for good cause having been shown within the meaning of the Federal Rules of Civil Procedure, and it appearing that the parties consent to the entry of this Protective Order, IT IS HEREBY ORDERED THAT:

(1) All such documents produced through discovery by either party shall be treated as confidential by all parties to this litigation. Such documents and all copies, summaries, compilations, notes or abstracts thereof, shall be used exclusively in this action and for no other purpose, except that the Plaintiff may use such documents for the purpose of taking legal action against any third-parties related to the issues in

this case. Upon the completion of this action, all such documents, together with any copies thereof, will either be destroyed or returned to the producing counsel, at said counsel's election. Any and all lists which are used to identify specific tax and payroll records by number and name will also be maintained as strictly confidential under the terms of this paragraph and will be returned or destroyed under the terms of this paragraph, upon conclusion of this action.

(2) All such documents and the contents thereof may be disclosed to witnesses, persons employed as independent consultants by counsel and employees of counsel who have a need to review the contents of such documents to aid in the litigation of this case. Such individuals shall maintain and honor the confidentiality of these documents and the information contained therein, except as disclosure is necessary for handling this litigation. Disclosure of documents to persons (including consultants) other than counsel, witnesses, representatives of the parties, and counsels' employees shall be conditioned upon such persons agreeing to be bound by this Order.

(3) If such documents are used during depositions or in pleadings or briefs, the relevant portions of the deposition shall be treated as confidential in accordance with paragraph (1) above.

(4) This Protective Order shall govern all pretrial proceedings, but shall be subject to modification either before, during, or after the trial upon the merits, upon consent of the parties, or upon application and showing of good cause by any of the parties. This Order shall not affect the right of either party to use summary data or calculations based thereon. Any document, which is admitted into evidence, shall not lose its confidential designation under this agreement unless expressly ordered by the Court.

(5) The provisions of this Order shall not affect the admissibility of evidence or any objections to same at trial or any other proceeding in court, except as may be provided by separate order or agreement.

(6) Any documents (including briefs), tangible things or information designated as Confidential that are submitted to the Court in support of or in opposition to a motion or introduced at a hearing or during trial may retain their protected confidential status via redaction in accordance with the procedures outlined in paragraph III(f) of the Court's Guidelines to Parties and Counsel.

Respectfully submitted this 9th day of November 2016.

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SO ORDERED, this 9th day of November, 2016.



AMY TOTENBERG
JUDGE, UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

EXHIBIT A

STATEMENT OF CONFIDENTIALITY

By signing this document, I hereby certify that I have read the Consent Protective Order which was entered by the Court in **Amber M. Meade v. General Motors, LLC., in the United States District Court for the Northern District of Georgia, Civil Division, and assigned Civil Action File No. 1:16-CV-00991-AT.** I am one of the persons contemplated by paragraph 2 as authorized to receive disclosure of confidential records designated Confidential by any of the parties and I fully understand and agree to abide by the obligations and conditions of the Consent Protective Order. I further consent to be subject to the jurisdiction of the United States District Court for the Northern District of Georgia, Civil Division for purposes of any proceedings relating to the performance under, compliance with, or violation of the above-described Order.

Print Name

Signature

Date: _____